

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
Akron Division**

Drips Holdings, LLC,)	
)	
)	
Petitioner,)	Case No. 5:21-mc-17 Judge Barker
)	
v.)	
)	Arising from Civil Action No. 1:19-cv-
QUOTEWIZARD.COM LLC,)	12235-LTS, pending in the United
)	States District Court for the District of
Respondent.)	Massachusetts
)	

**DRIPS UNCONTESTED MOTION FOR LEAVE TO FILE A RESPONSE TO
QUOTEWIZARD’S REQUEST FOR TRANSFER OR FOR A STAY AND FOR A
BRIEF EXTENSION TO RESPOND TO QUOTEWIZARD’S MOTION TO STAY**

Drips Holdings, LLC (“Drips”) respectfully requests that the Court grant it leave to respond to QuoteWizard.com LLC (“QuoteWizard”) recent brief [ECF No. 13]. Although QuoteWizard’s brief purports to be a Response and Opposition to Plaintiff Joseph Mantha’s Motion to Intervene and to Transfer Action, it in effect is a motion in which QuoteWizard asks this Court to transfer this action to District of Massachusetts or in the alternative to stay this matter pending a ruling from the Massachusetts court. [ECF No. 13] at 4-7.

Although Mr. Mantha, as a stranger to the subpoena, lacks any authority or standing to request transfer, Drips recognizes that QuoteWizard, as the party who served the subpoena, may have the ability to request transfer under Federal Rule of Civil Procedure 45. Despite raising additional (and unfounded) arguments, however, QuoteWizard has failed to establish that exceptional circumstances exist, for reasons Drips requests leave to explain. Accordingly, Drips respectfully requests the Court grant it leave to respond to QuoteWizard’s filing within seven days

in order to, among other things, correct several inaccuracies in QuoteWizard's filing and explain why transfer and staying this case remains unwarranted.

Further, in its latest filing, QuoteWizard renews and submits additional arguments in support of its prior request for a stay, [ECF No. 11]. Accordingly, Drips requests a brief extension of its April 12, 2021 deadline to respond to QuoteWizard's motion for a stay [ECF No. 11] so that it may respond to QuoteWizard's overlapping and supplemental arguments in a single filing.

Drips thus requests that the Court grant it leave to submit a response to both QuoteWizard's motion to stay [ECF No. 11] and its latest filing [ECF No. 13] within seven days. QuoteWizard consents to Drips' request. *See* Ex. A.

Date: April 7, 2021

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CERTIFICATE OF SERVICE

I certify that on April 7, 2021, the foregoing was electronically filed with this Court's CM/ECF System and thereby served on counsel of record.

/s/Jesse L. Taylor